

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 20-33948 (MI)</b>
<b>Fieldwood Energy III LLC, et al.,</b>	§	
	§	<b>Chapter 11</b>
<b>Post-Effective Date Debtors<sup>1</sup>.</b>	§	
	§	<b>Jointly Administered</b>

**THIRD STIPULATION AND AGREED ORDER EXTENDING  
ANKOR ENERGY LLC'S AND ANKOR E&P HOLDINGS CORPORATION'S DEADLINE  
TO RESPOND TO PLAN ADMINISTRATOR'S OBJECTION TO PROOFS OF CLAIM**

**[Relates to Docket. No. 2825, 2896, 2991]**

This Stipulation and Agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the Plan Administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016]<sup>2</sup>; and (ii) ANKOR Energy LLC and ANKOR E&P Holdings Corporation (collectively, “**ANKOR**”) regarding the Plan Administrator’s Objection to ANKOR’s Proofs of Claim [Docket No. 2825] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

**WHEREAS**, on or about November 23, 2020, ANKOR timely filed separate proofs of claim identified as Claim Numbers 490, 508, 513, and 516 (collectively, the “**ANKOR Proofs of Claim**”).

---

<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

<sup>2</sup> Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

**WHEREAS**, the Plan Administrator filed his Objection on August 15, 2023, which included a response date of September 14, 2023, and a hearing on October 2, 2023, at 10:30 a.m. CST.

**WHEREAS**, on September 13, 2023, the Court entered the Stipulation and Agreed Order Extending Response Date and Resetting Hearing Date on Plan Administrator's Objection to Proofs Of Claim Filed By Ankor Energy LLC and Ankor E&P Holdings Corporation (Docket No. 2896) resetting the hearing on the Objection to **January 24, 2024, at 9:00 AM CST** and extending ANKOR's deadline to respond to the Objection to and through Wednesday, December 13, 2023.

**WHEREAS**, on December 12, 2023, the Court entered the Second Stipulation and Agreed Order Extending Ankor Energy LLC's and Ankor E&P Holdings Corporation's Deadline to Respond to Plan Administrator's Objection to Proofs of Claim (Docket No. 2991) extending ANKOR's response deadline to and through Friday, December 22, 2023.

**WHEREAS**, the Parties have agreed to enter into and jointly submit this Stipulation further extending Ankor's response date in connection with the Objection.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

1. ANKOR's deadline to respond to the Objection is extended to and through **Wednesday, January 10, 2024**, subject to further extensions based on the Parties' agreement.

**IN WITNESS WHEREOF**, this Stipulation has been executed and delivered as of the day and year first written below.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

---

UNITED STATES BANKRUPTCY JUDGE  
MARVIN ISGUR

**BOND ELLIS EPPICH SCHAFER JONES LOOPER GOODWINE P.C.  
LLP**

/s/ Aaron Guerrero

Ken Green  
Texas Bar No. 24036677  
Aaron Guerrero  
Texas Bar No. 24050698  
Bryan Prentice  
Texas Bar No. 24099787  
950 Echo Lane, Suite 120  
Houston, Texas 77024  
(713) 335-4990 telephone  
(713) 335-4991 facsimile  
[Ken.green@bondellis.com](mailto:Ken.green@bondellis.com)  
[Aaron.guerrero@bondellis.com](mailto:Aaron.guerrero@bondellis.com)  
[Bryan.prentice@bondellis.com](mailto:Bryan.prentice@bondellis.com)

/s/ Paul J. Goodwine

Paul J. Goodwine (La. Bar No. 23757)  
SDTX Federal ID No. 437800  
Lindsey M. Johnson (La. Bar No. 34610)  
SDTX Federal ID No. 2127344  
650 Poydras Street, Suite 2400  
New Orleans, Louisiana 70130  
Telephone: (504) 503-1500  
Facsimile: (504) 503-1501  
Email: [pgoodwine@loopergoodwine.com](mailto:pgoodwine@loopergoodwine.com)  
Email: [ljohnson@loopergoodwine.com](mailto:ljohnson@loopergoodwine.com)

**ATTORNEYS FOR ANKOR ENERGY  
LLC AND ANKOR E&P HOLDINGS  
CORPORATION**

**ATTORNEYS FOR DAVID DUNN, PLAN  
ADMINISTRATOR FOR THE POST-  
EFFECTIVE DATE DEBTORS**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of December, 2023 a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Aaron Guerrero  
Aaron Guerrero